

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

GREG ABBOTT, in his capacity as  
GOVERNOR OF THE STATE OF TEXAS,  
and THE STATE OF TEXAS,

*Defendants.*

Case No. 1:23-cv-00853-DAE

**The United States' Witness List**

The United States submits its Witness List pursuant to Western District of Texas Local Rule 16(f)(5). All witnesses may be contacted through undersigned counsel.

**I. WITNESSES EXPECTED TO BE PRESENTED THROUGH LIVE TESTIMONY**

Mike Chapman

Capt. Michael Cintron

Micky Donaldson

Dr. Ben Johnson

Neil Lebsock

Hilary Quam

Franciso Sainz

Capt. John Timmel

**II. ADDITIONAL WITNESSES WHO MAY BE CALLED AS NEEDED<sup>1</sup>**

Loren Flossman

Abraham Garcia

Ivan Morua

Joseph Shelnutt

Additional witnesses as necessary to authenticate documents and/or establish documents as business records or government records.

Any witnesses individually listed at the Preliminary Injunction Hearing, or individually listed and/or called at trial, by Defendants.

The United States reserves the right to present additional witnesses to be used for rebuttal or impeachment only. See Western District of Texas Local Rule CV-16(f)(5).

Respectfully submitted,

Dated: October 28, 2024

JAIME ESPARZA  
UNITED STATES ATTORNEY

TODD KIM  
ASSISTANT ATTORNEY GENERAL  
Environment & Natural Resources Division

/s/ Landon A. Wade  
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CA Bar No. 260660  
ANDREW D. KNUDSEN  
Trial Attorney  
DC Bar No. 1019697  
BRYAN J. HARRISON  
Trial Attorney

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<sup>1</sup> The United States will not be calling any USBP headquarters personnel in its case in chief. In the event a USBP headquarters witness becomes necessary for rebuttal and Jason Owens, Chief of the USBP, is unavailable, we reserve the right to call Walter Slosar, Chief of Law Enforcement Operations Directorate.

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*Counsel for the United States of America*

**CERTIFICATE OF SERVICE**

I certify that on October 28, 2024, a copy of this filing was served on counsel of record through the Court's electronic filing system.

/s/ Brian H. Lynk  
Brian H. Lynk